

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JACOB A. MATHLEY,

Defendant.

)
)
)
) Judge Alonso
) Case No. 20 CR 585
)
)
)
)
)
)

MOTION FOR MODIFICATION OF CONDITIONS OF BOND

Defendant, JACOB A. MATHLEY, by his attorney, Robert A. Heap, respectfully moves this Honorable Court to modify conditions of his bond and in support thereof states:

TRANSFER OF HOME CONFINEMENT

1. The Defendant, Jacob A. Mathley is currently on bond before this court with one of the conditions of said bond that he remain on home confinement subject to the oversight of pre-trial services;
2. The Defendant is currently residing under said home confinement at an apartment that he leased within the Northern District of Illinois. His mother is living with him at that location. The Defendant and his wife have recently purchased a new home located at 16480 Somonauk Road, DeKalb, Illinois, 60115.
3. This property is on two acres and is in the country. It is not near any schools, daycares, forest preserves or parks. He would reside with his family but

be in a basement apartment that can be sealed off from the upstairs. His mother would also be present at all times when the children are present. There would be no times that he is ever left with underage children without supervision.

4. This move would allow Mathley to be a part of his family's life on a regular basis while still maintaining the safety requirements ordered by this court. This move would also assist in the financial hardship that is caused by the leasing of separate housing.
5. As is the case when an older home is purchased, there are many projects that require work. The Defendant could provide the work on some of these projects while still staying on his property and not being around anyone other than his family.
6. This move would only be authorized upon the review and agreement of Pre-Trial Services

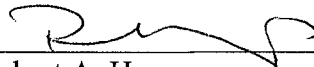
ADDITIONAL HAIRCUTS

7. At a previous court appearance, this court granted Mathley the permission to get a haircut. With this matter still pending before this court, it is necessary for additional haircuts. The Defendant is requesting that he be allowed to get a haircut once per month.
8. Any haircuts would be at the discretion of Pre-Trial Services.

WHEREFORE, the Defendant, JACOB A. MATHLEY respectfully requests that the

conditions of bond be modified to allow the Defendant to move to the location above and to receive additional haircuts upon the agreement of Pre-Trial Services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Heap', is written over a horizontal line.

Robert A. Heap
Attorney for Defendant

Robert A. Heap
Kuhn, Heap & Monson
101 N. Washington Street
Naperville, IL 60540
(630) 369-4980 ex. 1
Atty No.: 6185465